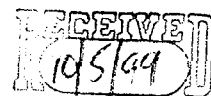




9132 '99 OCT -3 P3:38

October 1, 1999



The Office of Special Nutritionals (HFS-450)
Center for Food Safety and Applied Nutrition
Food and Drug Administration
200 C. Street S.W.
Washington, DC 20204

Dear Sir/Madam:

This is a notification pursuant to 21 U.S.C. 343(r)(6) that Standard Process Inc., Palmyra, Wisconsin 53156-0904, is making the following statements:

- (1) One of the most well established characteristics of vitamin E is its ability to destroy free radicals.*
- (2) Cataplex E is an antioxidant that protects, stabilizes, and repairs cell membranes.*
- (3) Cataplex E contains sex hormone precursors and also guards precious DNA.*
- (4) Vitamin E complex has been shown to support the reproductive, nervous, hematopoietic, cardiovascular, muscular, endocrine, integumentary, immune and renal systems.*

These statements are made for a dietary supplement containing a proprietary blend of bovine orchic extract, inositol, dried pea (vine) juice, ribonucleic acid, oat flour, bovine adrenal, beet (root), bovine spleen, ovine spleen, beet (root) juice, bovine liver, manganese lactate, and ascorbic acid. Other ingredients include honey, selenium yeast, potassium para-aminobenzoate, mixed tocopherols, and arabic gum. And the name of the product is Cataplex® E.

The information contained herein is accurate and Standard Process Inc. has substantiation that the statements are truthful and not misleading.

Sincerely yours,

Ann Holden
Standard Process Inc.

97S-0162

STANDARD PROCESS INC. • 1200 WEST ROYAL LEE DRIVE • PALMYRA, WI 53156 • 414-495-2122 • FAX 414-495-2512 • 1-800-848-5061

LET 4386

67491